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VIA ECF

The Honorable Richard J. Sullivan
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

***Re: Murphy et al. v. LaJaunie et al.
Case Number: 13 CV 6503 (RJS)***

Dear Judge Sullivan:

We represent the Defendants in the above referenced matter. We write, in accordance with the Court's directives at the June 21, 2016 pre-motion conference to report on the status of Defendants' compliance with the Court's April 15, 2016 Order regarding class discovery.

At this time, Defendants have produced a class list to Plaintiff's counsel, in excel format, containing all of the required information. In addition, we provided Plaintiffs' counsel with a DVD containing approximately 2.4 gigabytes of un-redacted tip sheets that span the entire class period.

Separately, Defendants have delivered five bankers boxes of responsive documents directly to Plaintiffs' counsel on Monday, June 27, 2016. We have been advised by Defendants that these boxes contain responsive material from the class period including, but not limited to, payroll records, payroll reports, and tip sheets. Defendants further advised us that additional documents were produced to Plaintiffs today. Defendants have advised us that all responsive documents in their possession have been produced to Plaintiffs. We cannot confirm if Defendants' representation is accurate.

Thank you for your consideration of the foregoing.

Respectfully submitted,
Kaufman Dolowich & Voluck, LLP

A handwritten signature in black ink, appearing to read "Jeffery A. Meyer".

Jeffery A. Meyer, Esq.

CC: All Counsel, Via ECF
4821-0968-7860, v. 1